

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

BRON MEDIA HOLDINGS USA CORP., *et al.*,

DEBTORS IN A FOREIGN
PROCEEDING.

CHAPTER 15

CASE NO. 23-56798-PMB

JOINTLY ADMINISTERED

NOTICE OF FILING OF ORDER OF ATTACHMENT
FOR CREDITOR HUDSON PRIVATE CORP.

PLEASE TAKE NOTICE that WV PARTNERS LLC A/K/A WEST VENTURES LLC (“West Ventures”), a party in interest in the above-referenced jointly administered chapter 15 proceeding (this “Chapter 15 Proceeding”), hereby files a true and correct copy of the *Order of Attachment* (the “Order”) attached hereto as Exhibit “A”.

PLEASE TAKE FURTHER NOTICE that the Order was entered in the action styled *WV Partners LLC v. Hudson Private Corp.*, Index No. 654392/2023, in the Commercial Division of the Supreme Court of the State of New York, County of New York, on February 28, 2024.

PLEASE TAKE FURTHER NOTICE that:

1. The Order was granted pursuant to section 6201(3) of the New York Civil Practice Law and Rules (“NY CPLR”) against **HUDSON PRIVATE CORP**, a creditor and party in interest in this Chapter 15 Proceeding.
2. The amount secured by the Order, including any interest, shall be for the sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon (the “Funds”), costs, and sheriff’s fees and expenses.

3. The Order provides that all persons served with this Order shall be and hereby are forbidden to make or suffer any sale, assignment or transfer of, or any interference with the Funds, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to a court order.
4. The Order provides that all garnishees upon whom a copy of this Order is served are directed to serve the statement required by section 6219 of the NY CPLR, by hand or overnight delivery upon the sheriff and counsel for West Ventures, Robert Kirshenberg, Esq., One Vanderbilt Avenue, New York, NY 10017, within five (5) days after levy.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order, **YOU ARE FORBIDDEN** to make or suffer any sale, assignment or transfer of, or any interference with the Funds, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to a court order.

Dated: March 18, 2024

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Alison Elko Franklin
Alison Elko Franklin
Georgia Bar No. 243353
3333 Piedmont Road, NE, Suite 2500
Atlanta, Georgia 30305
Telephone: (678) 553-2100
Facsimile: (678) 553-2212
Email: Alison.Franklin@gtlaw.com

*Counsel for WV Partners LLC
a/k/a West Ventures LLC*

EXHIBIT “A”

At I.A.S. Part 53 of the Supreme Court
of the State of New York, held in
and for the County of New York,
at the County Courthouse thereof,
located at 60 Centre Street, New York,
NY, on the 28 day of February, 2024

Present: Hon. Andrew Borrok
J.S.C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION

-----X	
WV PARTNERS LLC,	:
	:
Plaintiff,	:
	:
- against -	:
	:
HUDSON PRIVATE	:
CORP.,	:
	:
Defendant.	:
	:
-----X	

Index No. 654392/2023

**ORDER TO SHOW CAUSE
PURSUANT TO NY CPLR §§
6301, 6311 OR IN THE
ALTERNATIVE 6201(3)**

UPON READING AND FILING of the Affirmation of Miriam G. Bahcall, dated February 22, 2024, the Affirmation of Craig Phares, dated February 21, 2024, together with the exhibits annexed thereto, Plaintiff WV Partners LLC’s (“Plaintiff”) Memorandum of Law of in Support its Order to Show Cause Seeking an Injunction or in the Alternative an Order of Attachment, dated February 22, 2024, and upon all the pleadings and proceedings heretofore had herein,

AND it being alleged that:

1. A cause of action for a money judgment exists in favor of Plaintiff against Defendant Hudson Private Corp. (“Hudson”) for the principal sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon,
2. Plaintiff is entitled to recover that sum exceeding all counterclaims known to it;

3. It is likely that Plaintiff will succeed on the merits and will suffer irreparable harm absent interim relief; and/or

4. Hudson, with intent to defraud its creditors or frustrate the enforcement of a judgment that is likely to be rendered in Plaintiff's favor, has assigned, disposed of, encumbered or secreted property, or removed it from the state, or is about to do any of these acts.

LET Defendant Hudson SHOW CAUSE at a hearing before this Court, at IAS Part 53, Room 238, of this Court located at 60 Centre Street, New York, NY, on the 2nd day of April, 2024 at 9:30 am/pm or as soon thereafter as counsel can be heard, by Zoom or in person, why an Order should not be entered pursuant to Articles 62, 63, and 32 of the Civil Practice Law and Rules ("CPLR"):

1. Granting a preliminary injunction:

- a. Requiring Hudson and its officers, agents, attorneys and employees to pay to Plaintiff, within three (3) business day of the date of this Order all proceeds, monies or funds ("Proceeds"), not previously transferred to Plaintiff, received or collected on account of, related to, pursuant to, or in connection with any of the following: (i) the motion picture productions entitled: "Bombshell" and/or "Ghostbusters: Afterlife", (ii) the Settlement Agreement dated July 8, 2022 between Hudson, Plaintiff and Bron Creative USA, Corp. ("Settlement Agreement"), and/or (iii) the enforcement of Affidavit in Support of Confession of Judgment ("Confession of Judgment") executed by Bron Creative simultaneously with the Settlement Agreement, and/or any judgment entered pursuant to the Confession of Judgment;
- b. Enjoining Hudson and its officers, agents, attorneys and employees from dissipating, transferring, encumbering, conveying, removing or disposing any Proceeds, including any additional Proceeds received or collected after the entry of this Order; and
- c. Requiring Hudson and its officers, agents, attorneys and employees to pay any additional Proceeds to Plaintiff within three (3) business days of receipt; and

- d. Directing Hudson to provide, within three (3) business day of the date of this Order, a sworn accounting of all Proceeds received or collected to date, specifying the amount, the date received or collected, and current location of the Proceeds.

2. Granting an Order of Attachment:

- a. Securing monies owed to Plaintiff for the sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon (the "Funds");
- b. Directing deposit of the Funds into the Court; and

3. Granting such other and further relief that the Court deems just and proper, including the costs and attorneys' fees incurred in asserting this action.

IT IS HEREBY ORDERED that, pending the issuance of a final judgment in this action, Defendant Hudson and its officers, agents, attorneys and employees are directed to pay to Plaintiff, within three (3) business day of the date of this Order, all Proceeds received or collected by Hudson and not previously transferred to Plaintiff; and it is further

ORDERED that, pending the issuance of a final judgment in this action, Defendant Hudson and its officers, agents, attorneys and employees are enjoined and prohibited from dissipating, transferring, encumbering, conveying, removing or disposing any Proceeds, including but not limited to any additional Proceeds received or collected after the entry of this Order; and it is further

~~**ORDERED** that, pending the issuance of a final judgment in this action, Hudson and its officers, agents, attorneys and employees are directed to (i) pay to Plaintiff, within three (3) business days of receipt, any and all additional Proceeds received or collected, and (ii) notify Plaintiff and its counsel of receipt of any additional Proceeds within three (3) business days of receipt, and it is further~~

AR

ORDERED that, Hudson shall provide, within three (3) business day of the date of this Order, a sworn accounting of all Proceeds received and/or collected to date, specifying the amount,

the date each amount was received or collected, and current location of the Proceeds; and it is further

ORDERED, that an Order of Attachment is hereby granted pursuant to CPLR § 6201(3); and it is further

ORDERED, that the amount to be secured by this Order, including any interest, shall be for the sum of \$14,144,154.10 as of August 31, 2023, plus unpaid interest thereon, costs, and sheriff's fees and expenses; and it is further

ORDERED that, sufficient reason having been shown therefor, pending the issuance of a final judgment in this action, Defendant Hudson shall deposit the Funds into the Court pursuant to CPLR § 2601; and it is further,

ORDERED, that all persons served with this Order shall be and hereby are forbidden to make or suffer any sale, assignment or transfer of, or any interference with the Funds, or pay over or otherwise dispose of any such debt, to any person other than the sheriff, except upon direction of the sheriff or pursuant to a court order; and it is further

ORDERED, that all garnishees upon whom a copy of this Order is served are directed to serve the statement required by CPLR § 6219, by hand or overnight delivery upon the sheriff and Robert Kirshenberg, located at One Vanderbilt Avenue, New York, NY 10017, counsel for Plaintiff, within five days after levy; and it is further

~~**ORDERED** that personal or overnight service of a copy of this Order to Show Cause and the papers upon which it is based, upon either defendant or its counsel, on or before _____ o'clock in the _____ noon, _____, shall be deemed good and sufficient service thereof; and it is further~~

B
A

Ma Fritz accepted service on 10/24/24. (AM)

ORDERED, that ~~service of a copy of this Order Defendant Hudson by~~ E-filing or overnight service, together with the papers upon which it is granted, on or before _____, be deemed good and sufficient service thereof. Opposition papers, if any, shall be served by upon counsel for the Plaintiff, Robert Kirshenberg, located at One Vanderbilt Avenue, New York, NY 10017, so as to be received by 5 ~~a~~m./p.m. on or before March 22, 2024.

Ordered, that money shall paid an additional in the amount of \$5,000 in support of the attachment by March 22, 2024 @ Jm.

Dated: New York, New York
2/28, 2024

ENTER:

A
 J.S.C.

HON. ANDREW BORROK
 J.S.C.

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *Notice of Filing of Order of Attachment for Creditor Hudson Private Corp.* using the Court's CM/ECF System, which serves the same upon all participants therein who have appeared in this case:

- **Bryan E. Bates** bbates@phrd.com
- **Kennedy Bodnarek** kbodnarek@phrd.com
- **Brian P. Hall** bhall@sgrlaw.com; sgr.notifications@gmail.com
- **Michael F. Holbein** mholbein@sgrlaw.com
- **Walter E. Jones** wjones@balch.com; fednoticesatl@balch.com
- **David B. Kurzweil** kurzweild@gtlaw.com; brattons@gtlaw.com
- **Louis G. McBryan** lmcbryan@mcbryanlaw.com; alepage@mcbryanlaw.com
- **Cameron M. McCord** cmccord@joneswalden.com; jwdistribution@joneswalden.com; ljones@joneswalden.com; cparker@joneswalden.com; lpineyro@joneswalden.com
- **Office of the United States Trustee** ustpreion21.at.ecf@usdoj.gov
- **Matthew Petrie** petriem@gtlaw.com
- **Patrick Silloway** psilloway@balch.com; ddaley@balch.com
- **J. Nevin Smith** tpauley@smithconerly.com; jsmith@smithconerly.com; R40523@notify.bestcase.com

I further certify that on the date indicated below, I caused true and correct copies of the foregoing *Notice of Filing of Order of Attachment for Creditor Hudson Private Corp.* to be served upon the parties listed below via e-mail:

- **Aaron Gilbert** agilbert@bronstudios.com
- **Asim Iqbal** aiqbal@millerthomson.com
- **Bryan Hicks** bjhicks@millerthomson.com
- **Monica Faheim** mfaheim@millerthomson.com

- **Mark Wentzell** Mark.Wentzell@ca.gt.com
- **James Saxton** james.saxton@ca.gt.com
- **Eric Jamieson** Eric.Jamieson@ca.gt.com
- **John Birch** jbirch@cassels.com
- **Peter Dunne** dunnep@bennettjones.com
- **Mike Shakra** shakram@bennettjones.com
- **Joshua Foster** fosterj@bennettjones.com
- **Peter Rubin** peter.rubin@blakes.com
- **Adam J. Korn** ajkorn@comerica.com
- **Jeff Colvin** jdcolvin@comerica.com
- **Alejandro Garcia Perez** agarcia@animaestudios.com
- **Jason Cloth** jason.cloth@cwmmoviefund.ca
- **Suraj MaraBoyna** suraj@maraboyinacapital.com
- **Christoher Cheng** winecpc@gmail.com
- **Christine Haebler** christinehaebler@gmail.com
- **Richard McConnell** Richard.McConnell@cwmmoviefund.ca
- **Debbie H. Patrick** bpatrick@sde.bz
- **Gary N. Solomon Sr.** jburas@cbtno.com
- **Guido Campello Trust** guido@campello.com
- **John Raymonds** john@raymonds.com
- **John Duca** Johnd@daytonaauto.ca
- **Prentiss C Patrick and Buddy Patrick** Buddypatrick4@gmail.com
- **Irina Race** irina.race@rbc.com

- **Lorna Badeo** lbadeo@dga.org
- **David Gendron** dgendron@tpc.us
- **Nicholas Woodall** Nicholas.Woodall@ubcpactra.ca
- **Grace Pontius** gpontius@dga.org
- **Moirra Holmes** Mholmes@filmfinances.ca
- **Sandy Schmidt** sandy@schmidtfinancial.com
- **Kevin Fritz** kaf@msf-law.com
- **Peter Rubin** peter.rubin@blakes.com
- **John Salmas** john.salmas@dentons.com
- **David F. Staber** dstaber@akingump.com

I further certify that on the date indicated below, I caused true and correct copies of the foregoing *Notice of Filing of Order of Attachment for Creditor Hudson Private Corp.* to be served upon the parties listed below via U.S. First Class Mail and First Class International Mail with adequate postage prepaid:

Sara L. Chenetz
Perkins Coie LLP
1888 Century Park East
Suite 1700
Los Angeles, CA 90067

Jonathan Shenson
Greenberg Glusker LLP
2049 Century Park East
Suite 2600
Los Angeles, CA 90067

BRON GROUP OF
COMPANIES
5542 Short Street
Burnaby, BC V5J 1L9
Canada

BRON Media Holdings USA
Corp.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

BRON Creative USA, Corp.
1700-Park Place, 666 Burrard
Street
Vancouver, British Columbia
Canada

BRON Digital USA, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

BRON Life USA Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

BRON Releasing USA Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

BRON Studios USA Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

BRON Studios USA
Developments Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

BRON Ventures 1, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Bakhorma, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Drunk Parents, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Fables Holdings USA, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Fables Productions USA Inc
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Gossamer Holdings USA, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Gossamer Productions USA Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Harry Haft Productions, Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Heavyweight Holdings, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

I Am Pink Productions, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Lucite Desk, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

National Anthem Holdings, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

National Anthem ProdCo Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Oakland Pictures Holdings, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Pathway Productions, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Robin Hood Digital PC USA Inc.
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Robin Hood Digital USA, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Solitary Holdings USA, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Surrounded Holdings USA LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Welcome To Me, LLC
1700-Park Place, 666 Burrard
Street
Vancouver, BC V6C 2X8
Canada

Creative Wealth Media Lending
LP 2016
c/o Creative Wealth Media
GenPar Ltd.
151 Bloor Street West, Suite 700
Toronto, ON M5S 1S4
Canada
Attn: Richard McConnell

Bennett Jones LLP
3400 One First Canadian Place
P.O. Box 130
Toronto, ON M5X 1A4
Canada
Attn: Peter Dunne, Mike Shakra,
and Joshua Foster

Bennett Jones LLP
666 Burrard Street, Suite 2500
Vancouver, BC V6C 2X8
Canada

BRON Media Corp.
Suite 1700, Park Place
666 Burrard Street
Vancouver, BC V6C 2X8
Canada
Attn: Aaron Gilbert

Miller Thomson LLP
40 King Street West, Suite 5800
Toronto, ON M5H 4A9
Canada
Attn: Asim Iqbal

Grant Thornton Limited
Suite 1600 - 333 Seymour Street
Vancouver BC V6B 0A4
Canada
Attn: Mark Wentzell

Cassels Brock & Blackwell LLP
40 Temperance Street, Suite 3200
Toronto, ON M5H 0B4
Canada
Attn: John Birch

Miller Thomson LLP
700 West Georgia St, Suite 2200
Vancouver, BC V7Y 1K8
Canada
Attn: Asim Iqbal

Cassels Brock & Blackwell LLP
Suite 2200, HSBC Building
885 West Georgia Street
Vancouver, BC V6C 3E8
Canada
Attn: John Birch

Dated: March 18, 2024

/s/ Alison Elko Franklin
Alison Elko Franklin